

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*

Case No. 1:18-OP-45090

*The County of Cuyahoga v. Purdue Pharma  
L.P., et al.*

Case No. 1:17-OP-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF TIMOTHY W. KNAPP IN SUPPORT OF MANUFACTURER  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT  
ON PLAINTIFFS' FAILURE TO OFFER PROOF OF CAUSATION**

I, Timothy W. Knapp, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan Finance, LLC, Allergan plc, Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.

2. I submit this declaration in support of Manufacturer Defendants' Motion for Summary Judgment on Plaintiffs' Failure to Offer Proof of Causation.

3. Attached as Exhibit 1 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Meredith Rosenthal.

4. Attached as Exhibit 2 is a true and correct copy of excerpts of the May 4, 2019 deposition transcript of Meredith Rosenthal.

5. Attached as Exhibit 3 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Katherine Keyes.

6. Attached as Exhibit 4 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Anna Lembke.

7. Attached as Exhibit 5 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Mark A. Schumacher.

8. Attached as Exhibit 6 is a true and correct copy of excerpts of the April 29, 2019 deposition transcript of Katherine Keyes.

9. Attached as Exhibit 7 is a true and correct copy of excerpts of the May 9, 2019 deposition of Craig J. McCann.

10. Attached as Exhibit 8 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of Craig J. McCann.

11. Attached as Exhibit 9 is a true and correct copy of excerpts of the April 15, 2019 Expert Report of James E. Rafalski.

12. Attached as Exhibit 10 is a true and correct copy of excerpts of the May 14, 2019 deposition transcript of James E. Rafalski.

13. Attached as Exhibit 11 is a true and correct copy of excerpts of the June 13, 2019 deposition transcript of Lacey R. Keller.

14. Attached as Exhibit 12 is a true and correct copy of excerpts of the May 17, 2019 deposition transcript of Seth B. Whitelaw

15. Attached as Exhibit 13 is a true and correct copy of excerpts of the March 25, 2019 Expert Report of David Cutler.

16. Attached as Exhibit 14 is a true and correct copy of excerpts of the April 26, 2019 deposition transcript of David Cutler.

17. Attached as Exhibit 15 is a true and correct copy of excerpts of the March 25, 2019 Public Nuisance Expert Report of Thomas McGuire.

Dated: June 28, 2019

Respectfully submitted,

/s/ Timothy W. Knapp

Timothy W. Knapp  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Tel: (312) 862-2000  
timothy.knapp @kirkland.com

*Attorney for Defendants Allergan Finance, LLC f/k/a  
Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.;  
Allergan Sales, LLC; Allergan USA, Inc.; and specially  
appearing Defendant Allergan plc f/k/a Actavis plc*

**CERTIFICATE OF SERVICE**

I, Timothy W. Knapp, hereby certify that the foregoing document was served via electronic mail to all parties.

/s/ Timothy W. Knapp  
Timothy W. Knapp  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Tel: (312) 862-2000  
timothy.knapp@kirkland.com